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11
12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
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15 TRAVELERS COMMERCIAL
16 INSURANCE COMPANY, a
17 Connecticut corporation,

18 Plaintiff,

19 vs.

20 NEW YORK MARINE AND
21 GENERAL INSURANCE COMPANY,
22 a New York corporation,

23 Defendant.
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Case No. 2:21-cv-5832-GW (PDx)

Hon. George H. Wu, Courtroom 9D

**DECLARATION OF KAYLA
ROBINSON IN CONNECTION
WITH TRAVLERS
COMMERCIAL INSURANCE
COMPANY'S MOTION TO
CONSOLIDATE THIS ACTION
FILED BY TRAVELERS WITH
ACTION FILED BY DEFENDANT
NEW YORK MARINE AND
GENERAL INSURANCE
COMPANY AGAINST INSURED**

Complaint Filed July 8, 2022

DECLARATION OF KAYLA ROBINSON

I, Kayla Robinson, declare as follows:

1. I am an attorney at law admitted to practice law before this court. I am a Senior Managing Associate at Pasich LLP, counsel for non-party Amber Heard. in connection with her dispute with New York Marine General Insurance Company and the action titled *New York Marine & General Insurance Company v. Heard*, No. 2:22-cv-04685-GW (PDx) (the “NY Marine Action”), filed on July 8, 2022. I have personal knowledge of the facts stated herein. If called and sworn as a witness, I could and would testify competently as to these facts.

2. Ms. Heard generally does not oppose consolidation of these two matters. However, though this non-opposition, Ms. Heard does not intend to waive any rights, and does not consent to the current litigation calendar.

3. In addition, Ms. Heard intends to file a motion to stay *New York Marine & General Insurance Company v. Heard* and, if the actions are consolidated, will seek a stay of the consolidated coverage action pending the resolution of the underlying litigation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this Declaration is executed on October 19, 2022, at San Diego, California.



KAYLA ROBINSON